



INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY

Bureau of Alcohol, Tobacco and Firearms

Washington, D.C. 20226

Number: 78-4

Date: April 11, 1978

USE OF BENZENE IN SDA PRODUCTS

Proprietors of Distilled Spirits Plants,
Users of Specially Denatured Alcohol,
Reprocessors of Specially Denatured Alcohol
Articles, and Others Concerned:

Purpose. This circular is issued to inform industry members that the Occupational Safety and Health Administration, Department of Labor, has established a permanent standard for protection of workers exposed to benzene. The standard limits employee exposure to one part benzene per million parts of air as an 8-hour time-weighted, average concentration, with a ceiling level of 5 PPM for any 15-minute period during the 8-hour day. However, the standard has been challenged in the U. S. Court of Appeals for the Fifth Circuit. An injunction has been granted against enforcement of the new standard pending appeal.

Effect. If the standard is upheld, the immediate practical effect may force many users of benzene denatured alcohol to shift to formulas produced with other authorized denaturants, and other users of benzene, such as producers of anhydrous alcohol, to use other compounds or processes.

SDA formulas. Benzene is an authorized denaturant for production of SDA formulas 2-B, 27 CFR 212.17; 2-C, 27 CFR 212.18; and 12-A, 27 CFR 212.23. However, in lieu of benzene, sections 212.17 and 212.18 authorize the use of 1/2 gallon of rubber hydrocarbon solvent; and Revenue Ruling 72-145, 1972-1 C.B. 418 (Internal Revenue), authorizes the use of toluene in formulas 2-B and 12-A in the same amounts specified for benzene; i. e., 1/2 gallon in 2-B and 5 gallons in 12-A.

Compliance. Manufacturers holding approved ATF forms 1479-A for formulas 2-B, 2-C, and 12-A may continue to use these formulas produced with the above alternate

denaturants without having to file new ATF forms 1479-A. However, the manufacturers must, by letter, notify their respective regional regulatory administrators of the new formulations which will be used. Distillers of anhydrous alcohol intending to use other compounds or processes in lieu of benzene should file ATF form 2607 to amend the statement of process where necessary.

Inquiries and Request for Comments. Inquiries concerning this circular or comments regarding proposals for other possible substitutes for benzene should be addressed to the Assistant Director, Technical and Scientific Services, 1200 Pennsylvania Avenue, NW., Washington, DC 20226.

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Director

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